

FILED
Clerk
District Court

MAY 01 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorneys for Defendants
American Overseas Marine Corporation
and General Dynamics Corporation

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

KENNETH COUTURE,
Plaintiff,

vs.

AMERICAN OVERSEAS MARINE
CORPORATION and GENERAL
DYNAMICS CORPORATION,

Defendants.

CIVIL ACTION NO. CV05-0024

**DEFENDANTS EXPERT WITNESS
DISCLOSURES; EXHIBIT A;
CERTIFICATE OF SERVICE**

DEFENDANTS EXPERT WITNESS DISCLOSURES

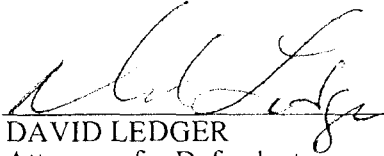
Defendants hereby disclose expert witnesses to be called to testify at trial.

1. Noel Slapp, Allied Marine Surveyors, P.O. Box 5773, Saipan, MP 96950. Allied Marine's company profile and curriculum vitae of Mr. Slapp are attached hereto as Exhibit A. Mr. Slapp will testify regarding the configuration and use of the pipe rack located at the 63' passage deck and to matters related to the same subject. It should be noted that Mr. Slapp will testify as to his expert opinions in his capacity as a defense expert, as well as a fact witness with regard to the pipe rack.

1 2. Defendants will name an expert to testify regarding industry standards for medical
2 facilities on board merchant marine vessels and delivery of medical services to seamen serving
3 aboard merchant marine vessels such as the M/V JACK LUMMUS. This expert will offer
4 rebuttal testimony to Plaintiff's Dr. Osborne as well as his or her affirmative opinions.
5

6 DATED: May 1, 2006.

7 CARLSMITH BALL LLP


8 DAVID LEDGER
9 Attorneys for Defendants
10 American Overseas Marine Corporation
11 and General Dynamics Corporation
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1st day of May 2006, I will cause to be served, via hand delivery, a true and correct copy of **DEFENDANTS EXPERT WITNESS DISCLOSURES; EXHIBIT A** upon the following Counsels of record:

William M. Fitzgerald, Esq.
Law Office of William M. Fitzgerald
1st Floor, Macaranas Building
Post Office Box 909
Saipan, MP 96950

and

Bruce Berline, Esq.
Law Office of Bruce Berline
1st Floor, Macaranas Building
Post Office Box 5682 CHRB
Garapan, Saipan MP 96950

DATED: May 1, 2006.


DAVID LEDGER

**Allied
Marine
Surveyors**

Hull & Machinery
Loading & Discharging
Stability & Deck Loads
Draft & Quantity
Marine Cargo Insurance
Adjusting

P.O. Box 5773 CHRB,
SAIPAN, MP96950.
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Fax: 1 (670) 234 9512
Pager: 1 (670) 236 1154
E-mail: allied@itecnmi.com

Our Reference:
01032729
Your Reference:

COMPANY PROFILE
Saipan & Guam

Principals: Noel Slapp, Australian DOT Master Mariner Class I (Foreign Going, Unlimited),
Australian Institute of Marine Surveyors, Society of Naval Architects and Marine Engineers

Rick Care, DOT Master Mariner Class I (Foreign Going, Unlimited),
Australian Institute of Marine Surveyors

Gerry Seymour, UK Master Mariner Foreign Going,
Australian Institute of Marine Surveyors

James Short, Australian DOT Chief Engineer

Timothy Westman, USCG Limited Master

Associated Surveyors: John Robinson MNI, UK Master Mariner Foreign Going,
Rick Seidler, USCG Limited Master

History: - Incorporated in the Commonwealth Northern Mariana Islands (C.N.M.I.), September 1993,
and more recently in Australia and Guam. Previously incorporated as the surveying
department of Vimar Offshore Industries (VOI), a marine services company in the
C.N.M.I..

Allied Marine Surveyors Limited (AMS) through its principals offers a range of marine
survey services inter alia: ISO & ISM Auditing, hull and machinery surveys, cargo loading
and discharge (general, bulk, liquid, hazardous), heavy lift and project cargoes, draft,
insurance valuation and condition, marine cargo claims, average adjusting. Additionally, it
offers stevedoring consulting services particularly where it pertains to project and heavy lift
cargoes.

The principals of AMS, have over 70 years combined experience in marine surveying. They
have performed:

1. H & M & IMO safety certificate surveys for Lloyds Registry, American
Bureau of Shipping, Det Norske Veritas, Bureau Veritas, Vanuatu,
various flag states;
2. H & M, valuation and damage surveys for numerous P & I clubs and
insurance companies such as Shipowners Mutual P & I Club
Luxembourg, British Marine Mutual Insurance Associates, Ltd., Lloyds
underwriters and agents, UK P & I Club, Britannia, Japan P & I, Korea

Visit our web site, alliedmarine.net

AMS

EXHIBIT A

AMS

Our Reference: 01032729

Page No. 2

- P & I, TT Club, Salvage Association¹;
3. Stability surveys for United States Coast Guard and underwriters;
 4. Underwater hull surveys for American Bureau of Shipping, Bureau Veritas, Germanscher Lloyd, owners and underwriters,
 5. Cargo loading and discharge surveys for numerous P & I clubs, underwriters, consignees, survey companies and shippers;
 6. Draft surveys for numerous shippers, consignees and ship owners, port authorities survey companies and bailees;
 7. Marine Cargo Damage surveys and average adjusting for numerous underwriters including Lloyds, consignees, P & I clubs, ship owners, and shippers;
 8. Condition and Valuation surveys
 9. Salvage and repair evaluation, supervision, and performance for numerous owners, underwriters, and authorities,
 10. ISO & ISM audits and consulting

Additionally, the principals have been actively involved in ship management, ownership, chartering and operation, so have broadly based experience in interpreting the information gained from surveys, particularly as it pertains to, and affects all of the interested parties.

They have consulted to and performed numerous specialised cargo deliveries including heavy lifts, dangerous and hazardous cargoes.

The principals have testified at court hearings, government hearings and arbitration hearings where their technical testimony and opinion was accepted and affected the decisions of the courts.

Associations: Allied Marine Surveyors Limited is associated with the Society of Naval Architects & Marine Engineers, Australian Institute of Marine Surveyors, as well as other leading marine services and surveying companies, and experts throughout the world for technical and physical backup.

Divers: Noel Slapp, James Pinson, Fred Nosek, Rick Seidler

¹ AMS (Saipan) is correspondent for TT Club (Thomas Miller) in the Micronesia

Visit our web site <http://www.alliedmarine.net>

CURRICULUM VITÆ

NOEL SLAPP

Date of Birth:	15 August 1956
Current Address:	P.O. Box 3 CHRB, Saipan, MP96950.
Nationality:	Australian
Member	Australian Institute of Marine Surveyors No. 220 Society of Naval Architects & Marine Engineers, NJ
Appointed Surveyor to	Lloyds' agent for marine cargo losses, and Salvage Association, and Flag States, and others
Correspondent for:	Throughtrans Services (Asia) Limited as General Correspondent for the Through Transport Club
Accepted as expert witness in:	US Federal Court, and National and State courts of Federated States of Micronesia

1. EDUCATION:

1974:	Higher School Certificate - matriculated 95%-100%
1976	Dive Master
1978	Obtained Certificate of Competency Second Mates Unlimited Foreign Going.
1978-1980 (1980)	Attended Sydney Technical College (Nautical) engineering Obtained Certificate of Competency First Mates Unlimited Foreign Going.
1984	Obtained Certificate of Competency Master Foreign Going Unlimited (Australian No. 425).
1997	Obtained certification (Stebbing & Partners, Inc.) IRCA course No. 9891 - Auditor/Lead Auditor for ISM and ISO
1997	Obtained Annual Safety Inspector No. ISB-07 from Directorate General of Consular and Maritime Affairs, Republic of Panamá
1998	Obtained Annual Safety Inspector No. IMD-75 from Directorate General of Consular and Maritime Affairs, Republic of Panamá
Other Certificates Held	Radar Observers Radar Simulator Radio Telephony
Courses Attended	Shipmaster's Medical Advanced Fire Fighting Liferaft Simulator Average Adjusters

Ref: 020731